

Douglas J. Suttles

Chief Operating Officer



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July 5, 2010

Rear Admiral James A. Watson Federal On-Scene Coordinator United States Coast Guard

data is transparent to USCG and EPA.

Weekly Source Control Surface Dispersant Plan (July 8 through July 14, 2010)

Dear Admiral Watson,

In compliance with the May 26, 2010, Dispersant Monitoring and Assessment Directive - Addendum 3 (the "Directive"), BP Exploration & Production Inc. ("BP") submitted a weekly Source Control Surface Dispersant Plan for the week July 1 to July 7, which you approved on June 30. The plan allowed for a maximum daily application volume (calendar day) of 6,000 gallons, unless more was required to control VOCs. From July 1 through July 5, the average daily volume applied was ~487 gallons. The maximum daily application was 1,473 gallons on July 2. The current offshore air monitoring plan for source control (2200-T2-DO-PN-4002-4 signed May 25, 2010) identifies air monitoring instrumentation, location and action levels to respond to VOC excursions. In addition, vapor suppression guidelines (attachment 1) were put in place May 29, 2010 to

BP respectfully requests approval of the Weekly Source Control Dispersant Plan for July 8 though July 14, as follows

provide additional granularity for action requirements. The air monitoring

	<u>Date</u>	Expected Maximum Volume per calendar
day (gals)		3
	July 8	6000
	July 9	6000
	July 10	6000
	July 11	6000
	July 12	6000
	July 13	6000
	July 14	6000

Should VOC monitoring dictate further deployment in accordance with the Air Monitoring Plan for Source Control, BP also respectfully requests to exceed these volumes as required.

Sincerely

Douglas J. Suttles

THE EXPECTED MAXIMUM APPLICATION OF DISPERSANT OF LOSS GALLONS
PER DAY WILL SERVE TO MITIGATE EXPECTED VOX EXCURSIONS ASSOCIATED WITH CAPPING ACTIVITIES PURSUANT TO REDUCING THE FLOW FROM THE WELL OVER A SEVERAL DAY PROCESS.

Approval granted subject to the above:

Rear Admiral James A. Watson

Federal On-Scene Coordinator

United States Coast Guard

Attachment 1 Vapor Suppression Guidelines May 29, 2010

These guidelines pertain to deployment and use of dispersant vessels and fire fighting vessels in Source Control Operations. The guidance provides additional detail around action levels specified in the Offshore Air Monitoring Plan for Source Control (2200-T2-DO-PN-4002-4). In addition, this guidance aligns with Dispersant Procedures for Vessels Adriatic and HOS Super H (2200-T2-LC-RP-4091) and Fire Fighting Vessels Operating (Priorities and Procedures (2200-T2-DO-PR-4057).

All vessels experiencing VOC levels exceeding 50PPM are directed to report it to Source Control SimOps Branch Director. Application of dispersant should be coordinated through the Source Control SimOps Branch Director.

Recommended actions for VOC management:

- VOC levels of 20 to 70ppm
 - Use Rem Forza and Kay Marine 5 vessels for wide spray water pattern to suppress and redirect vapors
- VOC over 70ppm
 - Notify Source Control SimOps Branch Director to coordinate dispersant use
 - Use HOS Super H and Adriatic as primary dispersant vessels
 - Use Rem Forza and Kay Marine 5 vessels to apply dispersant when wide spray water pattern is not effective

Addendum to Weekly Source Control Surface Dispersant Plan (July 8 through July 14, 2010)

The approval of the referenced surface dispersant plan granted on July 7, 2010 is amended as follows:

The maximum 6,000 gallon daily surface dispersant application rate is only authorized during active well-cap replacement operations. The expected maximum application of dispersant of 6,000 gallons per day during the top cap removal procedures will mitigate expected VOC excursions associated with capping activities pursuant to reducing the increased flow from the well over this several day process.

Thanks to the diligent efforts of all involved parties, the daily surface dispersant application rate to control VOCs has been reduced to under 200 gallons over the past two weeks. Prior to commencing the well-cap replacement operation and once it is completed the maximum daily surface dispersant application rate is not expected to exceed 3,000 gallons daily unless a spike in VOC monitoring dictate further deployment.

Rear Admiral Roy A. Nash

Deputy, Federal On-Scene Coordinator

United States Coast Guard